

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

Gregory Boyer, Plaintiff, v. Advanced Correctional Healthcare, Inc., <i>et al.</i> , Defendants.	Case No: 3:20-cv-1123-JDP Judge James D. Peterson Magistrate Judge Anita M. Boor
Gregory Boyer, Plaintiff, v. USA Medical & Psychological Staffing, Inc., <i>et al.</i> , Defendants.	Case No: 3:22-cv-00723-JDP Judge James D. Peterson Magistrate Judge Anita M. Boor

PLAINTIFFS 26(a)(3) DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(3), Plaintiff Gregory Boyer, by and through his attorneys, Loevy & Loevy, submit the following pretrial disclosures:

TRIAL WITNESS LIST

1. Gregory Boyer. Witness may be contacted through counsel. Witness may testify regarding Ms. Boyer's background, her activities in the days before she entered the Jail's custody, communications with the jail and Ms. Boyer while she was in custody, and damages.

2. Lisa Pisney. Witness may testify concerning her own conduct as alleged in the complaint, her interactions with other Jail staff, Ms. Boyer's healthcare at the Jail, as well as the policies and practices of Monroe County and Advanced Correctional Healthcare, Inc. ("ACH") with respect to the provision of medical care.

3. Amber Fennigkoh. Witness may testify concerning her own conduct as alleged in the complaint as well as her interactions with Ms. Boyer, Plaintiff, and other Jail staff; Ms. Boyer's healthcare at the Jail; and the practices of Monroe County and ACH with respect to the provision of medical care.

4. Stan Hendrickson. Witness may testify concerning his own conduct as alleged in the complaint as well as the practices of Monroe County and ACH with respect to staff's provision of medical care.

5. Danielle Warren. Witness may testify concerning her own conduct as alleged in the complaint as well as the practices of Monroe County and ACH with respect to staff's provision of medical care.

6. Shasta Parker. Witness may testify concerning her own conduct as alleged in the complaint as well as the policies and practices of Monroe County and ACH with respect to staff's provision of medical care.

7. Dr. Zafar Faraaz. Doctor in the Gunderson Healthcare System. May testify concerning Ms. Boyer's medical condition and cause of death.

8. Dr. Laina J. Webb. Doctor in the Gunderson Healthcare System. May testify concerning Ms. Boyer's medical condition and cause of death.

9. Dr. Daniel L. Cox. Doctor in the Gunderson Healthcare System. May testify concerning Ms. Boyer's medical condition and cause of death.

10. Dr. Nolan M. Kleinjan. Doctor in the Gunderson Healthcare System. testify concerning Ms. Boyer's medical condition and cause of death.

11. Lt. Jeffrey Spencer. Monroe County Sheriff investigator. May testify concerning the investigation into Ms. Boyer's death.

12. Dr. Michel A. Stier, Anatomic Pathology Laboratory, 600 Highland Ave., Madison, WI 53792. Dr. Stier performed Ms. Boyer's autopsy and may testify concerning his findings relating to same.

13. Dr. Laina J. Webb. Doctor in the Gunderson Healthcare System, who may testify concerning Ms. Boyer's medical condition and cause of death.

14. Dr. Daniel L. Cox. Doctor in the Gunderson Healthcare System, who may testify concerning Ms. Boyer's medical condition and cause of death.

15. Dr. Nolan M. Kleinjan. Doctor in the Gunderson Healthcare System, who may testify concerning Ms. Boyer's medical condition and cause of death.

16. Lt. Jeffrey Spencer. Monroe County Sheriff investigator, who may testify concerning the investigation into Ms. Boyer's death.

17. Dr. Michel A. Stier, Anatomic Pathology Laboratory, 600 Highland Ave., Madison, WI 53792. Dr. Stier performed Ms. Boyer's autopsy and may testify concerning his findings relating to same.

18. Lucas Runice, Monroe County. C/o Monroe County counsel. Mr. Runice is expected to testify consistent with the deposition testimony he gave in this case.

19. Brooke Dempsey, Monroe County. C/o Monroe County counsel. Ms. Dempsey is expected to testify consistent with the deposition testimony she gave in this case.

20. Sandi Lehman, ACH Nurse. C/o ACH counsel. Ms. Lehman is expected to testify about ACH policies and procedures, policies and procedures relating to the provision of medical care at the Monroe County Jail, and communications regarding same.

21. Vicki Reilly, ACH mental health employee. C/o ACH counsel. Ms. Reilly is expected to testify about the provision of care at the Monroe County jail and her interactions with Ms. Boyer at the jail in December 2019.

22. Nathan White, Wisconsin Department of Corrections. C/o Wisconsin Department of Corrections. Mr. White is expected to testify about regulatory oversight regarding the Monroe County jail and oversight regarding Ms. Boyer's death.

23. Norman Johnson, c/o USA Medical counsel. Mr. Johnson is expected to testify consistent with his deposition, and his knowledge of Lisa Pisney and Amber Fennigkoh's provision of medical care and training.

24. Travis Schamber, c/o USA Medical counsel. Mr. Schamber is expected to testify consistent with his deposition, and his knowledge of Lisa Pisney and Amber Fennigkoh's provision of medical care and training.

25. Abi Chrudimsky. Former employee of Advanced Correctional Healthcare, Inc. who was previously staffed as a nurse at the Monroe County Jail who may testify concerning Lisa Lisney and Amber Fennigkoh's provision of healthcare and the practices with respect to the provision of healthcare at the Monroe County jail.

26. Ken and Paula Cebertowicz. Christine Boyer's brother and his spouse, who testify concerning Ms. Boyer's background and damages in the case.

27. Hershey Suri. Loevy & Loevy employee serving as a prover regarding a November 3, 2023 phone conversation between plaintiff's counsel and Abi Chrudimsky. Contact through counsel.

28. Dr. Suzanne Bentley Dr. Bentley is disclosed as an expert under Rule 702. She is expected to testify as to any and all opinions arrived at in her previously disclosed expert report and any deposition testimony provided in this case. Dr. Bentley's CV and rate of compensation were previously disclosed. Contact through counsel.

29. Dr. Bruce Charash Dr. Charash is disclosed as an expert under Rule 702. She is expected to testify as to any and all opinions arrived at in his previously disclosed expert report and any deposition testimony provided in this case. Dr. Charash's CV and rate of compensation were previously disclosed. Contact through counsel.

30. Dr. Homer Venters Dr. Venters is disclosed as an expert under Rule 702. He is expected to testify as to any and all opinions arrived at in his previously disclosed expert report and any deposition testimony provided in this case. Dr. Venters's CV and rate of compensation were previously disclosed. Contact through counsel.

31. Dr. Richard Erdman. Dr. Erdman was Christine Boyer's primary care physician. Dr. Erdman testify concerning Ms. Boyer's chronic health problems, his care of Ms. Boyer, whether he was contacted by anyone at the Jail, and what he would have done if he had been contacted. Dr. Erdman is expected to testify as to the care he provided to Christine Boyer. Tomah Family Medicine, 505 Gopher Drive, Tomah, WI 54660.

32. Teresa Isensee. Ms. Isensee is the Chief Deputy Medical Examiner for Monroe County and held this position at the time of Christine Boyer's death. Monroe County Medical Examiner, 112 S. Court St., Rm 1005, Sparta, WI 54656.

33. Michael A. Stier. Dr. Stier is a pathologist consulted by the Monroe County Medical Examiner for the purposes of Christine Boyer's autopsy report. Anatomic Pathology Laboratory, 600 Highland Ave., Madison, WI 53792.

34. Dr. Faraaz Zafar. Dr. Zafar is a physician who provided care and treatment to Christine Boyer on or after December 23, 2019. Gunderson Health System, 1900 South Ave., La Crosse, WI 54601.

35. Dr. Jasmine Hudnall. Dr. Hudnall is a palliative care physician who provided care and treatment to Christine Boyer on or after December 23, 2019. Gunderson Health System, 1900 South Ave., La Crosse, WI 54601.

36. Dr. Renata Chalfin. Dr. Chalfin is a neurologist who provided care and treatment to Christine Boyer on or after December 23, 2019. Gunderson Health System, 1900 South Ave., La Crosse, WI 54601.

37. Jerry Gedig. Ms. Boyer's father, who may testify concerning Ms. Boyer's background and damages in this case.

38. Jodi Gedig. Ms. Boyer's sister, who may testify concerning Ms. Boyer's background and the damages in this case.

39. James and Amy Buchan. Family friends, who may testify concerning Ms. Boyer's background and the damages in this case.

40. Dennis Whitehead. Family friend, who may testify concerning Ms. Boyer's background and the damages in this case.

41. Jay Neitzke. Family friend, who may testify concerning Ms. Boyer's background and the damages in this case.

42. Debbie and Jerry Borst, family friends, may testify concerning Ms. Boyer's background and the damages in this case.

43. Roy and Audra Bissen. Family friends, who may testify concerning Ms. Boyer's background and the damages in this case.

44. Troy Brown. Family friend, who may have testify concerning Ms. Boyer's background and the damages in this case.

45. Rick Sharpe. Family friend and member of Combat Veterans Motorcycle Association, who may testify concerning Ms. Boyer's background and the damages in this case.

46. Dr. Bruce Pollander. Former family doctor, who may testify concerning regarding Ms. Boyer's medical history.

Plaintiff also reserves the right to call any witness identified by Defendants in their Rule 26(a)(3) disclosures.

TRIAL EXHIBIT LIST

1. MONROE COUNTY_001518 Audio Call
2. MONROE COUNTY 2008
3. July 5, 2019 Email from Amber Fennigkoh to Travis Schamber
4. July 4, 2019 Email from Amber Fennigkoh to Stan Hendrickson
5. December 23, 2019 Narrative Progress Notes
6. December 20, 2018 Email from Hallman to Hendrickson and Fennigkoh
7. ACH Training Slides
8. Advanced Practice Nursing Written Collaborative Agreement
9. December 20, 2018 Email from Hallman to Hendrickson and Fennigkoh
10. P012443 Union Subpoena Response - Video
11. ACH 13404 Introduction to Correctional Healthcare Video
12. ACH 13403 Detox in Jails Video

13. ACH 13402 Jail is not a Health Spa Video
14. Deposition Transcripts
15. Plaintiff's Expert Reports
16. Plaintiff's Expert Rebuttal Reports
17. Family Photos
18. Monroe County Jail Exterior Photos
19. Spark Training Records
20. JAB Management Services Records
21. Intro to Correctional Healthcare Training Video Transcript
22. Detox in Jails Video Transcript
23. Jail is Not a Health Spa Video Transcript
24. December 21, 2019 Intake Screening
25. December 21–22, 2019 Monroe County Booking Narrative Notes
26. Monroe County Observation Log
27. Monroe County MAR
28. December 23, 2019 Gundersen Health Medical Records
29. Boyer Gundersen Health Medical Records
30. December 21, 2019 Monroe County Narrative Notes
31. December 22, 2019 Monroe County Narrative Notes
32. December 23, 2019 Monroe County Narrative Notes
33. December 24, 2019 Monroe County Narrative Notes
34. December 31, 2019 Monroe County Narrative Notes
35. Autopsy Report
36. Boyer Jail Records
37. RN Bonus Program - Fennigkoh
38. Boyer Subpoena Production GB 000001 - GB 004228
39. Gunderson Health Records

40. Text Messages
41. Monroe County Jail Emails
42. Fennigkoh Emails
43. Wisconsin Department of Financial Institutions Report and Records of ACH
44. Wisconsin Department of Financial Institutions Report and Records of USA Medical
45. ACH Emails
46. Emails re Surveillance Video
47. Professional Services Subcontract Agreement
48. JAC Information and Records Management
49. ACH Training Slides
50. MONROE_COUNTY_000001.mp4
51. MONROE_COUNTY_000003.mp4
52. MONROE_COUNTY_000004.mp4
53. MONROE_COUNTY_000005.mp4
54. MONROE_COUNTY_000006.mp4
55. MONROE_COUNTY_000007.mp4
56. MONROE_COUNTY_000008.mp4
57. MONROE_COUNTY_000009.mp4
58. MONROE_COUNTY_0000010.mp4
59. MONROE_COUNTY_000011-Audio
60. MONROE_COUNTY_000593-Audio
61. MONROE_COUNTY_000594-Audio
62. MONROE_COUNTY_000595-Audio
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- 68. MONROE_COUNTY_001516-Audio
- 69. MONROE_COUNTY_001517-Audio
- 70. MONROE_COUNTY_001518-Audio
- 71. MONROE_COUNTY_001519-Audio
- 72. MONROE_COUNTY_007482-Audio
- 73. MONROE_COUNTY_007483-Audio
- 74. MONROE_COUNTY_007484-Audio
- 75. MONROE_COUNTY_007485-Audio
- 76. MONROE_COUNTY_007487-Audio
- 77. MONROE_COUNTY_013609-Audio
- 78. MONROE_COUNTY_013610-Audio
- 79. MONROE_COUNTY_013611-Audio
- 80. MONROE_COUNTY_013612-Audio
- 81. MONROE_COUNTY_013613-Audio
- 82. MONROE_COUNTY_013614-Audio
- 83. Jail Calls Audio
- 84. Jail Calls Transcripts
- 85. Susan Minter Podcast Video 1
- 86. Susan Minter Podcast Video 2
- 87. Susan Minter Podcast Video 3
- 88. Susan Minter Podcast Video 4
- 89. Susan Minter Podcast Video 5
- 90. Susan Minter Podcast Video 1 Transcript
- 91. Susan Minter Podcast Video 2 Transcript
- 92. Susan Minter Podcast Video 3 Transcript
- 93. Susan Minter Podcast Video 4 Transcript

94. Susan Minter Podcast Video 5 Transcript
95. Susan Minter Podcast Video 6 Transcript
96. Primary Report by Danielle Warren
97. Raw Data Report – Booking Cell 4
98. Monroe County Booking Records
99. Intake Medical Screening Report
100. Chest Pain Protocol
101. Boyer Death Investigation Records
102. UW Health – Anatomic Pathology Laboratory Records
103. Medtox Laboratory Report
104. Narcotic Log
105. ACH Training Records
106. Demonstrative Exhibit Placeholder 1
107. Demonstrative Exhibit Placeholder 2
108. Demonstrative Exhibit Placeholder 3
109. Demonstrative Exhibit Placeholder 4
110. Demonstrative Exhibit Placeholder 5
111. Demonstrative Exhibit Placeholder 6
112. Demonstrative Exhibit Placeholder 7
113. Demonstrative Exhibit Placeholder 8
114. Demonstrative Exhibit Placeholder 9
115. Demonstrative Exhibit Placeholder 10

Plaintiff also reserves the right to call any Exhibits identified by Defendants in their Rule 26(a)(3) disclosures.

Dated: August 1, 2025

/s/ Maria Makar

One of Plaintiff's Attorneys

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